

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

DR. ELVISHA DHAMALA, DR. SHELLEY  
FACENTE, DR. ROBERT MAHON, and  
DR. LUCINA UDDIN,

*Plaintiffs,*

v.

ELSEVIER, B.V., INFORMA PLC,  
INTERNATIONAL ASSOCIATION OF  
SCIENTIFIC, TECHNICAL, AND  
MEDICAL PUBLISHERS, JOHN WILEY &  
SONS, INC., SAGE PUBLICATIONS, INC.,  
SPRINGER NATURE AG & CO. KGaA.,  
TAYLOR & FRANCIS GROUP, LLC,  
TAYLOR & FRANCIS GROUP, LTD.,  
WOLTERS KLUWER HEALTH, INC.,  
WOLTERS KLUWER N.V., and JOHN  
DOES 1 THROUGH 50,

*Defendants.*

Case No. 1:24-cv-06409 (HG)

ORAL ARGUMENT REQUESTED

**FOREIGN DEFENDANTS' MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated May 5, 2025 and the Declarations attached thereto, Defendants Informa PLC, Taylor & Francis Group, Ltd., and Wolters Kluwer N.V., (collectively, the "Foreign Defendants"), hereby move this Court before the Honorable Hector Gonzalez, United States District Court Judge, Eastern District of New York, for an Order dismissing with prejudice the Foreign Defendants for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2) and for such other and further relief as the Court may deem just and proper.

DATED: May 5, 2025  
New York, NY

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/s/ Robert A. Milne

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Respectfully submitted,

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N.V. and Wolters Kluwer Health, Inc.*